

REMARKS

In view of the following remarks, Applicants respectfully request reconsideration and allowance of the subject application. This amendment is
5 believed to be fully responsive to all issues raised in the Office Action mailed June 10, 2004.

Claim Objections

Applicants traverse the objection of claims 10-21. Applicants submit
10 that the claims are consistent with the description provided in the specification, at least at pages 12-17.

Applicants further submit that the Examiner's claim objections appear to be directed to the substantive language of the claims, rather than to form. Accordingly, the objection is improper.

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Claim Rejections

Rejections Under 35 U.S.C. §102

Claims 10-13 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 5,790,782 to Martinez, et al. (hereinafter, "the
20 '782 patent") as modified by the teachings of U.S. Patent No. 5,965,665 to Martinez, et al. ("the '665 patent"). Applicants traverse these rejections.

Initially, the rejections are *per-se* inappropriate as a matter of form. Anticipation under 35 U.S.C. §102 requires that *each and every element* of the claim be set forth in the manner recited in the claim in a *single prior art*
25 *reference*. (See, MPEP 2131). The rejections fail even to assert that the

claimed subject matter is set forth in a single prior art reference.

Accordingly, the rejections are inappropriate and should be withdrawn.

Further, the rejections are incorrect as a matter of substance.

Independent claim 10 recites the limitation of "a cabinet bus linked to each of
5 the shelves and adapted to generate and provide a unique shelf identifier
signal to each of the shelves." The '782 patent, alone or in combination with
the '665 patent, fails to disclose (or even to suggest) a cabinet bus that
generates and provides a unique shelf identifier signal to each of the
shelves. To the contrary, the connectors in the '782 do not generate a
10 signal; they merely transfer a simple analog voltage. Further, the analog
voltage disclosed in the '782 patent it is not a shelf identifier signal. The
analog voltage signal must be processed by an A/D converter and the EMU
to generate a meaningful shelf identifier signal. (See col. 5, line 28 through
col. 6, line 18). Therefore, the '782 patent cannot anticipate (or render
15 obvious) claim 10.

Dependent claims 11-18 depend ultimately from claim 10, and are
allowable in view of this dependency, and in view of the specific limitations
recited therein.

20 Rejections Under 35 U.S.C. §103

Independent claim 1 was rejected under 35 U.S.C. §103(a) as being
obvious over the '782 patent in view of the '665 patent. Applicants traverse
this rejection.

Independent claim 1 recites the limitation that the first and second
25 junction boxes provide respective first and second shelf identifier signals to a

device enclosure connected to the respective first and second shelves. The '782 patent, alone or in combination with the '665 patent, neither discloses nor suggests these limitations. Neither the connectors disclosed in the '782 patent nor the junction boxes disclosed in the '665 patent provide shelf
5 identifier signals to a device enclosure connected to the shelf. To the contrary, the connectors in the '782 patent carry a simple analog voltage signal; it is not a shelf identifier signal. The analog voltage signal must be processed by an A/D converter and the EMU to generate a meaningful shelf identifier signal. (See col. 5, line 28 through col. 6, line 18). The '782 patent
10 neither discloses nor suggests a junction box that provides a shelf identifier signal to a device enclosure.

The '665 patent cannot compensate for the deficiencies of the '782 patent. The '665 patent fails to add any significant disclosure relating to shelf identifier signals. Indeed, the '665 patent simply cross-references the
15 shelf identification technique disclosed in the '782 patent. (See col. 7, lines 41-55).

The '782 patent, alone or in combination with the '665 patent, fails to disclose or suggest the limitations recited in independent claim 1. Therefore, the rejection of claim 1 is improper and should be withdrawn.

20 Dependent claims 2-9 depend from independent claim 1 and are allowable at least by virtue of their dependency, and by virtue of the specific limitations recited therein. Applicants submit that the arguments submitted in the reply to the Office Action mailed January 9, 2004 remain on the record, and notes that these arguments were not addressed in the Action.

Independent claim 19 was rejected under 35 U.S.C. §103(a) as being unpatentable over the '782 patent in view of the '665 patent". Applicants traverse this rejection. Independent claim 19 recites the limitation that the cabinet bus is adapted to generate and to provide a unique shelf identifier to each of the shelves. The '782 patent, alone or in combination with the '665 patent, fails to disclose or suggest a cabinet bus that generates and provides a unique shelf identifier signal to each of the shelves. As noted above, the connectors in the '782 patent carry a simple analog voltage signal between shelves. The connectors do not generate a signal. Further, the signal disclosed in the '782 patent it is not a shelf identifier signal. The analog voltage signal must be processed by an A/D converter and the EMU to generate a meaningful shelf identifier signal. (See col. 5, line 28 through col. 6, line 18). Therefore, the '782 patent, alone or in combination with the '665 patent, cannot render obvious claim 19.

Claims 20-21 depend ultimately from claim 19, and are allowable at least by virtue of this dependency. In addition, claims 20-21 recite specific structural limitations neither disclosed nor suggested by the '782 patent, alone or in combination with the '665 patent.

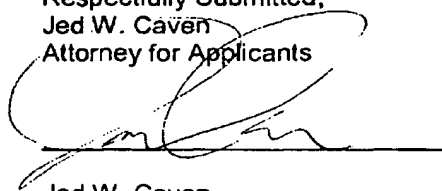
CONCLUSION

Claims 1-21 are believed to be in condition for allowance. Applicants respectfully request reconsideration and prompt issuance of the present application. Should any issue remain that prevents immediate issuance of the application, the Examiner is encouraged to contact the undersigned attorney to discuss the unresolved issue.

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